

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**Petition of Franklin W. Olin College of Engineering**

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**D.T.E. 01-95**

**OLIN COLLEGE  
SECOND SET OF DOCUMENT AND INFORMATION REQUESTS TO  
NSTAR ELECTRIC AND GAS CORPORATION**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to the recipient or to any individual or entity sponsoring testimony or retained by the recipient to provide information, advice, testimony, or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These Requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what type of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input, (c) a description of the recordation system employed (including descriptions, flow charts,

etc.), and (d) the identity of the person who was in charge of the collection of the input materials, the processing of input materials, the databases utilized, and the programming to obtain the output.

8. The terms used interchangeably within these information requests relating to “any and all”, “documentation”, “support”, and “justification” mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.
9. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records, microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
10. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, and if such response has been provided to Olin College to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
11. If the recipient cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the recipient cannot answer the Request in full, and state what information or knowledge is in the recipient’s possession concerning the unanswered portions.
12. If, in answering any of these Document and Information Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set for the language you feel is ambiguous and the interpretation you are using to respond to the Request.
13. If a document requested is no longer in existence, identify the document, and describe in detail the reasons why the document is unavailable.
14. Provide copies of all requested documents.
15. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and

the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

16. Each request for information includes a request for all documentation which supports the response provided.
17. Provide two copies of each response with all attachments: one to Eric J. Krathwohl as specified on the service list and one to Stephen P. Hannabury, Vice President Administration and Finance, Olin College, 1735 Great Plain Avenue, Needham, MA 02492-1245. In addition to the required paper copies of the responses to information requests (and any associated attachments), please provide a copy of the response (and where possible, any attachments) by email to Eric J. Krathwohl, [ekrathwohl@richmaylaw.com](mailto:ekrathwohl@richmaylaw.com) and Stephen Hannabury, [Stephen.Hannabury@olin.edu](mailto:Stephen.Hannabury@olin.edu).
18. Please provide answers as they are completed.
19. Reference in the information requests to NSTAR shall include Boston Edison Company d/b/a NSTAR Electric and Gas or any other affiliate or predecessor company.



- OC-2-1 Referencing page 8, line 5 of Mr. Jessa's testimony, please specify all "other details."
- OC-2-2 Referencing page 10, lines 16-17 of Mr. Jessa's testimony, please provide: (a) all "industry-wide averages"; (b) all calculations yielding the "expected reliability" of 0.2 failures/year. To the extent, the methodology of the calculation is not clear from the calculation, please explain such methodology.
- OC-2-3 Referencing page 14, lines 18-20 of Mr. Jessa's testimony, please state when the decision was made to replace the first Station #148 transformer. Provide documentation confirming that date and describing the decisionmaking rationale for such replacement.
- OC-2-4 Referencing page 14, line 8 of Mr. Jessa's testimony, provide all communications by Boston Edison with Olin regarding investigation of the "complaints" and "action plans" and describe in detail the referenced "service upgrades."
- OC-2-5 Referencing page 16, line 2 of Mr. Jessa's testimony, provide all documentation supporting his belief that "the numbers are likely to be much closer."
- OC-2-6 Referencing page 16, line 6 of Mr. Jessa's testimony, does Boston Edison supply WMLP from other than Station #148? If yes, please provide data comparable to that provided for Station #148 regarding distribution performance and service quality to services supplied from such other stations. Particularly, discuss whether such other stations have the problems referenced by Mr. Jessa regarding switching.
- OC-2-7 Referencing page 17, lines 10-14 of Mr. Jessa's testimony, provide his understanding of the distances for line for Olin to take service from Boston Edison.
- OC-2-8 Referencing page 18, line 2 of Mr. Jessa's testimony, explain in detail all the "expensive facilities", and how they'd be different were electric service to be provided by Boston Edison.
- OC-2-9 Please provide three (3) samples of a completed work order form for a potential 4 MW load and service applications, if necessary redacting customer name and address.
- OC-2-10 Referencing page 13, lines 16-20 of Mr. Niro's testimony, please specify in detail all the costs that would make an interconnection "off of Great Hain Avenue" "much lower cost" than an interconnection "near the Wellesley border."

- OC-2-11 Referencing page 14, line 10 of Mr. Niro's testimony, what is "greater certainty"?
- OC-2-12 Referencing pages 17 and 18 of Mr. Niro's testimony, please describe Boston Edison's position on the concept of serving Olin as described in such testimony. In that context, could infrastructure costs be saved?
- OC-2-13 Provide all workpapers and any documentation showing the calculation and specification of all the costs of the options set forth in Exhibit ARJ-2.
- OC-2-14 List all other 3-4 megawatt customers (or larger) that are located on BECO's service territory line that have initiated service since 1997 and that could have been served by a municipal light plant or another electric distribution company. Please describe the cost savings that could have been achieved by such customers by connecting with other suppliers or distribution companies.

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